

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ZURU LLC and ZURU INC.,

Petitioners,

v.

CBS Broadcasting, Inc.

Respondent.

Misc. Case No:

June 26, 2025

**NOTICE OF MOTION TO COMPEL COMPLIANCE
WITH SUBPOENA DIRECTED TO CBS BROADCASTING, INC.**

Zuru LLC and Zuru Inc. (collectively, “Zuru” or “Petitioners”) move pursuant to 35 U.S.C. § 24 and Federal Rule of Civil Procedure 45 to compel CBS Broadcasting, Inc. (“CBS”) to comply with a duly issued Subpoena to Testify at an Oral Testimony Deposition and to Produce Documents directed to CBS Broadcasting Inc. (the “Subpoena”). CBS was duly served with the Subpoena and made no timely objection to it. Zuru provided CBS with extensive accommodations to permit compliance with the Subpoena, but CBS has neglected and/or refused to comply with it. For the reasons explained more fully in Zuru’s Memorandum of Law in Support of Motion to Compel Compliance with Subpoena Directed to CBS Broadcasting, Inc., the Court should grant this Motion and order CBS to comply with the Subpoena within fourteen (14) days of the Court’s order.

Respectfully submitted,

Date: June 26, 2025

ZURU INC. and ZURU LLC

By: /s/ Damian K. Gunningsmith
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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June, 2025 the foregoing Notice of Motion to Compel Compliance with Subpoena Directed to CBS Broadcasting, Inc. was served by email and mail to the following counsel:

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